

STATE OF SOUTH CAROLINA

BEFORE THE
PUBLIC SERVICE COMMISSION

In the matter of Petition for Approval of Nextel South
Corp.'s Adoption of the Interconnection Agreement
Between Sprint Communications Company L.P.,
Sprint Spectrum L.P. d/b/a Sprint PCS And
BellSouth Telecommunications, Inc. d/b/a AT&T
South Carolina d/b/a AT&T Southeast

COVER SHEET

DOCKET
NUMBER: 2007 - 255 - C

And

In the matter of Petition for Approval of NPCR, Inc.
d/b/a Nextel Partners' Adoption of the
Interconnection Agreement Between Sprint
Communications Company L.P., Sprint Spectrum
L.P. d/b/a Sprint PCS And BellSouth
Telecommunications, Inc. d/b/a AT&T South
Carolina d/b/a AT&T Southeast

DOCKET
NUMBER: 2007 - 256 - C

(Please type or print)

Submitted by: J. Jeffrey Pascoe

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☒ Other: MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation

- | | | | |
|--|--|--|---|
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: Rebuttal
Testimony |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In the matter of:)	
)	
Petition for Approval of Nextel South)	
Corp.'s Adoption of the Interconnection)	
Agreement Between Sprint)	
Communications Company L.P., Sprint)	Docket No. 2007-255-C
Spectrum L.P. d/b/a Sprint PCS And)	
BellSouth Telecommunications, Inc.)	
d/b/a AT&T South Carolina d/b/a)	
AT&T Southeast)	

In the matter of:)	
)	
Petition for Approval of NPCR, Inc.)	
d/b/a Nextel Partners' Adoption of the)	
Interconnection Agreement Between)	
Sprint Communications Company L.P.,)	Docket No. 2007-256-C
Sprint Spectrum L.P. d/b/a Sprint PCS)	
And BellSouth Telecommunications,)	
Inc. d/b/a AT&T South Carolina d/b/a)	
AT&T Southeast)	

MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL

NOW COMES, J. Jeffrey Pascoe of Womble Carlyle Sandridge & Rice, PLLC ("WCSR"), counsel for NPCR, Inc. d/b/a Nextel Partners and Nextel South Corp. ("Petitioners"), and moves the South Carolina Public Service Commission (the "Commission") for permission for Mr. Pascoe and WCSR to withdraw as counsel of record, and to substitute John J. Pringle, Jr., of Ellis, Lawhorne & Sims, P.A. ("Ellis Lawhorne") as counsel of record for Petitioners in these consolidated petitions (the "Petitions"). In support of this Motion, the undersigned respectfully shows the Commission the following:

1. On July 23, 2007, Petitioners commenced the Petitions against BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina d/b/a AT&T Southeast ("AT&T").

2. Mr. Pascoe signed both Petitions as counsel of record for Petitioners.
3. Because the Petitions are still in the early stages, and because the PSC will not hear the Petitions until January 31, 2008, the withdrawal of Mr. Pascoe and WCSR can be accomplished without material adverse effect on Petitioners.
4. No scheduled hearing will be delayed by the granting of this motion to withdraw.
5. Petitioners are aware of and consent to this motion to withdraw and substitute counsel.
6. Upon the withdrawal of Mr. Pascoe and WCSR, Mr. Pringle and Ellis Lawhorne will serve as counsel of record for Petitioners in the Petitions. Mr. Pringle and Ellis Lawhorne hereby give notice of appearance on behalf of Petitioners in the Petitions.

WHEREFORE, J. Jeffrey Pascoe and the law firm of Womble Carlyle Sandridge & Rice, PLLC respectfully request permission to withdraw as counsel for the Petitioners in these proceedings, and that John J. Pringle, Jr. and the law firm of Ellis, Lawhorne & Sims, P.A. be permitted to appear on behalf of Petitioners in these Petitions.

Respectfully submitted this 6th day of December, 2007.

/s/ J. Jeffrey Pascoe
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AT&T Southeast)


Docket No. 2007-256-C

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 6, 2007, she served a copy of the attached **Motion to Withdraw and to Substitute Counsel** by first-class mail, proper postage affixed addressed to the person(s) hereinafter named, at the place(s) and address(es) stated below, which is/are the last known address(es):

Patrick W. Turner, Esq.
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FILING INSTRUCTIONS.**